

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
AKRON DIVISION**

IN RE:

IN PROCEEDINGS UNDER CHAPTER 7

TODD C. LAWRENCE

CASE NO: 19-50098

Debtor

JUDGE: ALAN M. KOSCHIK

**MOTION TO VACATE ORDER GRANTING RELIEF FROM STAY AND
ABANDONMENT TO NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER**

NOW COMES Nationstar Mortgage LLC d/b/a Mr. Cooper, and hereby respectfully moves this Court to vacate the Order granting Relief from Stay and Abandonment, entered May 13, 2019 (docket # 20).

The Movant herein represents that the Debtor has submitted funds to become current on his mortgage. Additionally, the parties wish to enter into a Reaffirmation Agreement relating to the mortgage that encumbers the Debtor's real property, 90 South River Road, Munroe Falls, OH 44262.

WHEREFORE, the Movant herein requests that this Court approve this Motion and sign the Agreed Order uploaded concurrently with this Motion.

/s/ Chris E. Manolis
Chris E. Manolis (0076197)
SHAPIRO, VAN ESS, PHILLIPS &
BARRAGATE, LLP
4805 Montgomery Road, Suite 320
Norwood, OH 45212
(513) 396-8100
(847) 627-8805-fax
Attorney for Movant
cmanolis@logs.com

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 3rd day of June, 2019, a copy of the foregoing was served to the following:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Mark Franklin Graziani, Graziani Law, LLC, on behalf of Todd Lawrence a/k/a Todd C Lawrence, debtor(s), at mark_graziani@yahoo.com

Kathryn A. Belfance, on behalf of the Chapter 7 Trustee's office at kb@rlblp.com

United States Trustee at Registered address @usdoj.gov

And by regular U.S. mail, postage prepaid, on:

Todd Lawrence a/k/a Todd C Lawrence, 90 South River Road, Munroe Falls, OH 44262

Susan Lawrence, 90 South River Road, Munroe Falls, OH 44262

Kristen M. Scalise, CPA, CFE, Ohio Building, 175 S. Main St., Suite 400, Akron, OH 44308

/s/ Chris E. Manolis
Shapiro, Van Ess, Phillips & Barragate, LLP
Chris E. Manolis (OH-0076197)
4805 Montgomery Road, Suite 320
Norwood, OH 45212
Phone: (216) 373-3117
Fax: (847) 627-8805
Email: cmanolis@logs.com

19-034068 BK01; tr; May 29, 2019